



Control Number: 51415



Item Number: 423

Addendum StartPage: 0

PUC DOCKET NO. 81415-20 AMT: 27

**OFFICE OF PUBLIC UTILITY COUNSEL'S  
TWELFTH REQUEST FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

## Definitions

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forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

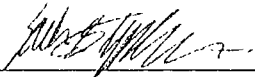
**SOAH DOCKET NO. 473-21-0538**  
**PUC Docket No. 51415**  
**OPUC's Twelfth Request for Information to**  
**Southwestern Electric Power Company**

- 12-1.** Please refer to the Rebuttal Testimony of Mr. Michael Baird, Exhibit MAB-2R. Please provide a detailed explanation of the changes in each of the line items included in this exhibit when compared to the original Rate Filing Package, W/P Schedule B-1.5.17.1. Please include the date on which the Company became aware of the changes in the Accumulated Deferred Federal Income Tax ("ADFIT") balances that are reported as Texas Unprotected Excess ADFIT and those reported as Texas Protected Excess ADFIT.
- 12-2.** Please refer to the Rebuttal Testimony of Mr. Baird, Exhibit MAB-2R. Please provide a detailed explanation of the changes to the Gross Up factor and the Texas Retail Allocation factor from those used in the Company's original Rate Filing Package, W/P Schedule B-1.5.17.1.
- 12-3.** Please refer to the Rebuttal Testimony of Mr. Baird, Exhibit MAB-2R. Please provide an explanation as to why the Company chose not to file an errata to the Rate Filing Package, W/P Schedule B-1.5-17.1 once the new ADFIT balances were known.
- 12-4.** Please refer to the Rebuttal Testimony of Mr. Baird, page 5. Please confirm or deny that the Company has updated all schedules and workpapers to reflect changes in the ADFIT balances included on Exhibit MAB-2R. If confirm, please provide the reference to the updated schedules and workpapers.
- 12-5.** Please refer to the Rebuttal Testimony of Mr. Baird, page 22. Please explain how SWEPCO would double recover the investment in the Oxbow Mine if the reserves are no longer billed through the fuel clause. Please include a detailed description of the fuel components currently included in the fuel factor that relate to Oxbow Mine billings to SWEPCO.

Dated: April 29, 2021

Respectfully submitted,

Lori Cobos  
Chief Executive & Public Counsel  
State Bar No. 24042276



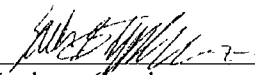
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ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 29<sup>th</sup> day of April 2021, by facsimile, electronic mail, and/or First class, U.S. Mail.



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Zachary Stephenson